

POSTED  
5/15/03

ACCEPTED  
Legal 5-15-03

SC PUBLIC SERVICE  
COMMISSION

2003 MAY 14 PM 4:

RECEIVED

BEFORE THE  
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

In Re: BellSouth Telecommunications, Inc.'s )  
Petition Requesting the Commission's Intervention )  
In NANPA NXX Code Assignments )

Docket No. 2003-161-C

PETITION FOR REVIEW OF NXX CODE DENIAL  
IN THE MT. PLEASANT RATE CENTER

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to rules adopted by the Federal Communications Commission ("FCC") for challenging determinations of the North American Numbering Plan Administration ("NANPA"), petitions the Public Service Commission of South Carolina ("Commission") for review of NANPA's denial of BellSouth's application for use of central office code numbering resources in the 843 area code. The denial that is the subject of this Petition impacts two BellSouth Customers: Blackbaud and Modulant.

In support of this petition BellSouth states:

1. BellSouth is a telecommunications public utility regulated by the Commission. It provides intraLATA, local exchange telecommunications services in the State of South Carolina and in the Mt. Pleasant exchange.
2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan ("NANP"). See 47 C.F.R. § 52.13 (a), (b).
3. On March 31, 2000, the FCC issued a Report and Order and Further Notice of Proposed Rule Making relating to numbering resource optimization ("FCC 00-104"). The goal of FCC 00-104 was to implement uniform standards governing requests for telephone numbering

resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers under the NANP.

4. Among other things, FCC 00-104 adopted a revised standard for assessing a carrier's need for numbering resources by requiring rate center based utilization rates to be reported to NANPA. FCC Order at ¶105. The FCC further required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant's rate center will be exhausted within six months of the application. The FCC reaffirmed this requirement in two subsequent orders. FCC 00-429 at ¶ 29 (rel. Dec. 29, 2000); FCC 01-362 at ¶¶ 48-49 (rel. Dec. 28, 2001). Prior to this ruling, the Central Office Code Assignment Guidelines, used by the industry and NANPA to make code assignments, required the applicant's existing number inventory within the applicant's serving switch to exhaust within six months of the code application or the carrier had to prove that it was unable to meet a specific customer's request with its current inventory of numbers in order for a code to be assigned.

5. This shift to a "rate center" basis from a switch basis for determining the need for new numbering resources was intended to "more accurately reflect how numbering resources are assigned" and to allow "carriers to obtain numbering resources in response to specific customer demands." FCC 00-104, ¶ 105.

6. In addition to the months-to-exhaust ("MTE") requirement described above, the FCC's rules also require carriers to meet a rate center utilization threshold of 60 percent in order to receive additional numbering resources in a given rate center. FCC 00-429 at Paragraph 22; FCC 01-362, ¶¶ 50-52. The utilization threshold will increase by five percent per year until it reaches a maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six

months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources. Id.

7. On or about April 9, 2003, BellSouth submitted a Pooling Administration System request for Thousand Number Block Relief for the assignment of several number blocks in the Mt. Pleasant exchange needed to meet the numbering demands of two customers Blackbaud and Modulant. Both companies are moving to the Daniel Island area of Charleston.

8. BellSouth's customer Blackbaud requires 3000 telephone numbers in the 2XXX, 3XXX, and 5XXX number blocks. Blackbaud is a company headquartered in Charleston, SC with offices in Glasgow, Scotland, and Sydney, Australia. Blackbaud has over 12,000 clients and it provides expertise and state-of-the-art software, services, and e-solutions to help non-profits operate more efficiently. It has more than 700 employees and annual revenues of \$100 million. (Customer's letter dated February 25, 2003 is enclosed as Exhibit A). The need for 3 thousand blocks of numbers (specifically the 2XXX, 3XXX, and 5XXX number blocks) are required because of the customer's internal switch dialing patterns and for the company's change of its overall business communications services.

9. Additionally, BellSouth's customer Modulant is moving its offices from 4130 Faber Place Drive, Charleston to a new location on Daniel Island. It will be the largest tenant in 146 Fairchild Street, Charleston, SC and needs 500 contiguous numbers within the 3XXX range to accommodate its current national dialing arrangement. (Customer's letter, Exhibit B).

10. On April 9, 2003, BellSouth completed a request for additional numbering resources to NANPA and NeuStar, the pooling administration, for assignment of additional numbering resources. This application was completed in accordance with Industry Numbering

Committee's (INC's) and/or NANPA's guidelines and filled out the necessary Month-to-Exhaust Certification Worksheets as required.

11. At the time of the filing of the Code request, the Mt. Pleasant Rate Center had an MTE of 16.16 months and a utilization of 76.946%. (Exhibit C).

12. Thereafter, also on April 9, 2003, NPA's Central Office Code Administration denied BellSouth's code request because BellSouth had not met the rate center based MTE criterion now set forth in the Central Office Code (NXX) Guidelines. NANPA denied BellSouth's code requests despite the fact that BellSouth does not have adequate numbering resources needed to satisfy its customers' demands in the Mt. Pleasant switch. NANPA's response is enclosed as Exhibit D.

13. BellSouth's inability to provide these important customers with the requested numbers prevents BellSouth from providing the quality of service this customer desires, needs, and expects. If BellSouth is not assigned the two NXX codes needed to meet the customer's request, BellSouth will be unable to provide telecommunications services requested by these customers.<sup>1</sup> NANPA's refusal to grant numbering resources sufficient to meet Blackbaud's and Modulant's needs is inconsistent with the FCC's position that "(u)nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources," FCC 00-429 at ¶ 61.

---

<sup>1</sup> BellSouth employs a number administration technique called "sequential numbering" in order to preserve the large blocks of consecutive numbers for as long as possible. The lack of consecutive numbers in the switch referred to above is the consequence of a high level of utilization, not any failure on BellSouth's part to conserve blocks of consecutive numbers.

14. Both the FCC's rules and the Central Office Code (NXX) Assignment Guidelines provide that state regulatory authorities have the power and authority to review NANPA's decision to deny a request for numbering resources. See FCC 01-362, Appendix A, Final Rules, § 52.15(g) (4) ("The carrier may challenge the NANPA's decision to the appropriate state regulatory commission"); FCC 01-362 at ¶¶ 61-66; Central Office Code (NXX) Assignment Guidelines § 13.0 ("Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body").

15. Prior to the FCC's Order and the resulting change in the Central Office Code (NXX) Assignment Guidelines, the MTE procedures used by NANPA permitted a carrier to receive a code assignment, even if the MTE requirement at the switch level was not met. These waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider's inventory did not have a block of sequential numbers large enough to meet the customer's specific request. Under today's procedures, NANPA looks at the MTE for the entire rate center without any exceptions. The FCC has determined, however, that States may grant relief "if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory." FCC 01-362, ¶ 64. In addition, the FCC has ruled that, "States...may grant requests for customers seeking contiguous block of numbers." Id.

16. BellSouth requests that the Commission reverse NANPA's decision to withhold numbering resources from BellSouth on the following grounds:

- a. NANPA's decision to withhold numbering resources from BellSouth interferes with BellSouth's ability to provide telecommunication services to its customers as required under South Carolina law; and
- b. BellSouth's request for numbering resources would not materially impact exhaustion of the remaining 216 available NXXs in the 843 area code.<sup>2</sup>

17. This Commission (see Docket No. 2002 –185-C, Order No. 2002-415) and other state regulatory agencies in Alabama, Florida, Georgia, Louisiana, North Carolina, and Tennessee similarly have recognized their jurisdiction and authority to review NANPA denials and to order the release of number resources to BellSouth to meet customer needs.

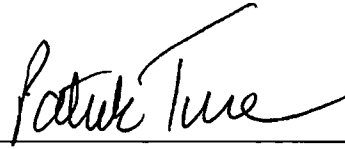
**WHEREFORE**, BellSouth requests that the Commission:Reverse the decision of NANPA to deny BellSouth's request for additional numbering resources;

1. Direct NANPA to provide two central office codes for the Mt. Pleasant switch; and
2. Grant the requested relief as soon as possible.

---

<sup>2</sup> This count is as of April 24, 2003, the most current data published by NANPA.

Respectfully submitted this 14<sup>th</sup> day of May 2003.

A handwritten signature in cursive script, reading "Patrick W. Turner". The signature is written in black ink and is positioned above a horizontal line.

---

Patrick W. Turner  
Suite 5200  
1600 Williams Street  
Columbia, South Carolina 29201  
(803) 401-2900

ATTORNEY FOR BELL SOUTH  
TELECOMMUNICATIONS, INC.

490999



February 25, 2003

BellSouth

Attention: LNA Manager supporting South Carolina

Blackbaud, headquartered in Charleston, South Carolina, with offices in Glasgow, Scotland, and Sydney, Australia, has more than 700 employees and annual revenues of over \$100 million.

Since 1981, Blackbaud has been providing tools and expertise to help nonprofits operate more efficiently. We do this by offering state-of-the-art software, services and solutions designed specifically for nonprofits. In addition to ensuring our 14,000 clients are using our tools to the maximum effect, we continually innovate and bring new solutions to market that help nonprofits jump the next hurdle.

Blackbaud is presently changing our overall business communications services and as a result of these changes we are requiring a new range of numbers, which will complete our business communications plan. We are in need of the number ranges 843-NXX-2XXX, 843-NXX-3XXX and 843-NXX-5XXX, all sharing the same NXX, out of the BellSouth Central office located in Mt. Pleasant SC, 843-381. We will be installing five BellSouth Primary Rate circuits to meet our needs.

Please grant this request as soon as possible so we can proceed with our new telecommunications services.

Sincerely,

Ross A. Johnson  
Manager, Infrastructure Planning and Acquisitions  
843-216-6200 ext. 2540

cc: Chris South

3000 Daniel Island Drive • Charleston, SC 29402-7341  
843-216-6200 • Sales: 800-443-9441 • Customer Support: 800-443-5996 • Fax: 843-216-6157  
Web site: [www.blackbaud.com](http://www.blackbaud.com)

CHARLESTON • GLASGOW • SYDNEY

EXHIBIT A



FEB-24-2003 (MON)

16:00

BELMOUTH

(P) 7047331370

NO. 226 0002  
P. 004/005

Feb 21 03 04:32p

p. 2



**To Whom It May Concern:**

In order to provide sufficient space for our intended growth, we are in the process of moving our offices from 4130 Faber Place Drive, Charleston, SC 29405 to a new location on Daniel Island. Our new address will be 146 Fairchild Street, Charleston, SC 29452. This is the building currently occupied by Cigna Healthcare and also another company known as Commonwealth Group. We are in the process of signing a lease for four years for space in this facility. At that time, we will be the largest tenant in the building.

Currently, our phone network consists of a PRI line with 23 channels, two T-1 lines bridged to provide a 3 meg pipe to the internet, and a T-1 line used to provide long distance and voice over IP services. As a result of this move and expansion, we will need to expand our current phone system to accommodate more numbers than we currently utilize. Our phone system is a relatively new Nortel Norstar system and we are assured that there is no problem with our future plans as designed. We use four numbers to provide services within this system. The digit 9 is used for obtaining an outside line. 8 is used to link us to our Sprint long distance service. 7 is used to provide the prefix to dial customer extensions. 2 is used to dial extensions in our Long Beach, CA office. All of our current internal extensions start with 3000 as a base number. All of the California extensions start with 2000 as a base number. Our voice over IP setup provides us the ability to dial the extensions directly whether located here in Charleston or in our office in Long Beach. Given the cost to implement this service, we would like to keep this dialing logic, if at all possible, in our new facility.

We have been informed that the CO in Mount Pleasant will now handle our phone service and that contiguous numbers seem to be at a premium or even non-existent.

If possible, we would like to request the following:

- Obtain 500 contiguous numbers to provide direct.

- Secure a number range of 3000 to 3499.

- Redirect our existing main number to the new main number for a period of six months to a year.

- Retain our current toll free number.

Any assistance in this matter would be greatly appreciated. As you can imagine, moving can be disruptive but we feel that this request will provide us with some continuity during this transition.

4130 Faber Place Drive • Suite 201 • Charleston, SC 29405

EXHIBIT B

03/01/2003 16:27

FEB-24-2003 (MON) 16:00

6E100TH

7047331370

NO. 226 0003  
P. UU3/ UU3

Feb 21 03 04:32p

P. 3

If you require any additional information, please contact me at your earliest convenience.

Sincerely,

Ronnie Miller  
Facilities Manager  
rmiller@modulant.com  
(843) 747-1470 ext 3050 office  
(843) 425-5050 cell

ACCEPTED FOR PROCESSING - 2019 October 23 11:59 AM - SCPSC - 2003-161-C - Page 10 of 20

## Pooling Administration System

michael.w.parker@bellsouth.com (SP)

Sign Out

### Request Resources

State **SOUTH CAROLINA**NPA **843**Rate Center **MTPLEASANT**OCN **9417-BELLSOUTH SO BELL**Type of Application **Application for Individual Blocks**Quantity of Blocks Requested **1****NOTE:**

If you are selecting a Rate Center that is moving to a new NPA due to a split, PAS will automatically migrate the request to the new NPA once the mandatory dialing date occurs.

# Pooling Administration System

michael.w.parker@bellsouth.com (SP)

Sign Out

## Months to Exhaust and Utilization Certification Worksheet - TN Level

Date Wednesday, April 9, 2003

OCN 9417

Company Name

Rate Center MOUNT PLEASANT

List all Codes NPA(s)-NXXs and Blocks NPA(s)-  
NXX-X(s)

Name of Block Applicant Mr Michael W Parker

Title Network Manager

Telephone Number (205) 977-3656

Fax Number (205) 977-3013

E-Mail michael.w.parker@bellsouth.com

A. Available Numbers 9696

B. Assigned Numbers 50060

C. Total Numbering Resources 65059

D. Quantity of numbers activated in the past 90  
days and excluded from the Utilization calculation 0

List excluded Code(s) or Block(s)

E. Growth History - Previous 6 months<sup>2</sup> \*

Month 1	436	Month 2	359
Month 3	367	Month 4	1424
Month 5	428	Month 6	586

F. Forecast - Next 12 months<sup>3</sup>

Month 1	600	Month 2	600
Month 3	600	Month 4	600
Month 5	600	Month 6	600
Month 7	600	Month 8	600
Month 9	600	Month 10	600
Month 11	600	Month 12	600

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) 600.000

H. Months to Exhaust<sup>4</sup> (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested	A Available Number	H Months to Exhaust
1	9696	16.160

I. Utilization<sup>5</sup> (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) \* 100 76.946

## Explanation

1. A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.
2. Net change in TNe no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.
3. Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
4. To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g)(3)(iii)).
5. Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Pooling Administration System - Microsoft Internet Explorer

Address: http://www.natnlpooling.com/nao/naoindex.jsp

## Pooling Administration System

Sign Out

Request Resources

State: SOUTH CAROLINA

NPA: 843

Rate Center: MTPLEASANT

GCN: 9417-BELLSOUTH SO BELL

Type of Application: Application for Individual Blocks

Quantity of Blocks Requested: 3

NOTE:  
If you are selecting a Rate Center that is moving to a new NPA due to a split, FAS will automatically migrate the request to the new NPA once the mandatory dialing date occurs.

Question? Email us  
© 1999-2003 NewStar, Inc.  
Legal Notices | Privacy Agreement

Pooling Administration System - Microsoft Internet Explorer

Address: http://www.natnlpooling.com/nao/naoindex.jsp

## Pooling Administration System

Sign Out

Part 1A

Type of Application: New

1.1 Contact Information:

Note: If any of the contact info is incorrect, edit your user profile.

Block Applicant:

Company Name

Headquarters Address: 675 WEST PEACHTREE ST NE

City: ATLANTA

State: GA

Zip: 30376

Contact Name: Ms Sharon Fear

Contact Address: 3525 COLONNADE PARKWAY, ROOM 102B1

City: BIRMINGHAM

State: AL

Zip: 35243

Telephone: (205) 977-3015

E-mail: sharon.fear2@bellsouth.com

Fax: (205) 977-3013

Pooling Administrator:

Contact Name: Ms Dara Sedane

Contact Address: 6800 Sutter St, Ste. 780

City: Oakland

State: CA

Zip: 94628

Telephone: (925) 363-7651

Fax: (925) 363-7656

Question? Email us  
© 1999-2003 NewStar, Inc.  
Legal Notices | Privacy Agreement

Poling Administration System - Microsoft Internet Explorer

Address: <http://www.nationalpoling.com/na/pa/index.jsp>

NEU STAR

Request For Resources

Modify

Download

Block Transfer

Transfer Block(s) in Service (if any)

Block Forecast

Load/Unload Forecast

User Profile

Transfer Block

Report

Question? Send us  
© 1999-2003 NeuStar, Inc.  
Legal Notice | Privacy Agreement

E-mail: [sara.sedano@neustar.biz](mailto:sara.sedano@neustar.biz)

### 1.2 General Information

LFN Needed No

NPA 843

OCN 9417-BELLSOUTH SD 8611

AOCN 9400

Parent Company OCN 9417

Number of Thousands-Blocks Requested 3

Switch Identification (Switching Number/PC) MOUNT PLEASANT

Rate Center MOUNT PLEASANT

Car or Wire Center Name MOUNT PLEASANT

Rate Center Sub Zone

### 1.3 Dates

Date of Application Monday, March 31, 2003

Requested Block Effective Date 26 Apr 2003

Request Expedited Treatment ☐ Yes ☒ No

### 1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Service Provider Incumbent Local Exchange Carrier (ILEC)

b) Primary type of service blocks to be used for Wholesale

--	--	--	--	--

### 1.5 Type of Request

Initial block for rate center ☐ Yes

Grow block for rate center ☒ Yes

Change block N/A

Disconnect block N/A

I hereby certify that the above information requesting an NPA-Block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (2004) Poling Administration Guidelines REC 93-01 27-023

Question? Send us  
© 1999-2003 NeuStar, Inc.  
Legal Notice | Privacy Agreement

Thousands-Block(s) NPA-Block(s) assignment preference

Click here to see the available blocks in the pool.

--	--	--	--	--

a) Thousands-Block(s) (NPA-Block(s)) that are undersubscribed for this assignment, if any

--	--	--	--	--

c) If requesting a code for LFN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) N/A

Pooling Administration System - Microsoft Internet Explorer

http://www.nationalpooling.com/nao/frames/index.jsp

## Pooling Administration System

Sign Out

Months to Expiry and Utilization Certification Worksheet - TH Level

Date Monday, March 31, 2003  
OCN 0347

Company Name  
Rate Center MOUNT PLEASANT

List all Codes NPA(s)-NXX and Blocks NPA(s)-NXX-XXXX

043-388-0/2, 4, 6/2, 8/2, 843, 854, 881, 884, 871

Name of Block Applicant Mr Sharon Fear  
TSM NETWORK MANAGER  
Telephone Number (205) 977-3015  
Fax Number (205) 977-3013  
E-Mail sharon.fear2@bellsouth.com

A Available Numbers \* 3699

B Assigned Numbers \* 50000

C Total Numbering Resources \* 65003

D Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation \* 0

---

NEU STAR

Request for Resources  
Modify  
Download  
Block Transfer  
Enter Block(s) in Service (Part)  
Cancel Terms  
Schedule Forecast  
Create/Modify Forecast  
User Profile  
Generate Blocks  
Reports

Question? Send us  
© 1999-2002 NeuStar, Inc.  
Legal Notices / Privacy Agreement

LIST INCLUDED CAPTION (BY BLOCKS)

E. Growth History - Previous 6 months<sup>2</sup> \*

Month 1	436	Month 2	358
Month 3	367	Month 4	1424
Month 5	428	Month 6	556

F. Forecast - Next 12 months<sup>2</sup> \*

Month 1	600	Month 2	3600
Month 3	600	Month 4	600
Month 5	600	Month 6	600
Month 7	600	Month 8	600
Month 9	600	Month 10	600
Month 11	600	Month 12	600

G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6)

1120.000

Question? Send us  
© 1999-2002 NeuStar, Inc.  
Legal Notices / Privacy Agreement



NEUSTAR

Requested For Resources

Monthly

Financial

Block Transfer

Customer Study In Service (F&T)

Search Form

Rebuild Forecast

Child-to-Child Forecast

User Profile

Search Model

Report

Month 11: 500, Month 12: 600

G. Average Monthly Forecast (Sum of months # 1-6 of Part F above) divided by 6: 1100.000

H. Months to Exhaust<sup>4</sup> (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Business	A. Numbers Available	H. Months to Exhaust
1	1000	3.212
2	1000	9.724
3	1500	30.633

I. Utilization<sup>5</sup> (Assigned Numbers (B) / (Total Numbering Resources (C) - Excluded Numbers (D)) \* 100: 76.946

Explanation

WHY HAVE BLOCK 2, 3 & 4 VIA CURT REQUEST. CANNOT USE BLOCKS IN CURRENT POOL AND WILL NEED NEW MIX TO PROVIDE AS REQUESTED.

1. A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate card. For auditing purposes, the applicant must retain a copy of this document.
2. Not change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.
3. Forecast of TNs needed in each following month, starting with the most recent month as Month #1.
4. To be assigned an additional thousand-block (100-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 10-104, § 52.15 (g)(3)(ii)).
5. Newly required numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(iii)).

Options: Detail view, 1/1/2019 10:07 AM, NEUSTAR, Inc., Legal Notices | Privacy Agreement

Show Call Log, Clear, Cancel

## Pooling Administration System

 michael.w.parker@bellsouth.com (SP)

[Sign Out](#)

### Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

You have requested more blocks than you will exhaust in six months.

#### Select One Option and Submit

- ☒ Return to the Months To Exhaust Form
- ☐ Discard all the information provided for the request and start with a fresh Part 1A
- ☐ State Waiver Option



- Request For Resources
- Block
- Transfer
- Block Transfer
- Custom Block in Service Part 1A
- Block Form
- Block Forecast
- Customizable Forecast
- Block Profile
- Block Needs
- Block

Question? Send us  
 1-800-2002-Neustar, Inc.  
 Legal Notice / Privacy Agreement

## Pooling Administration System

[Sign Out](#)

[View My Blocks](#)

You have requested more blocks than you will exhaust in six months.

**Select One Option and Submit**

- ☒ Return to the Months To Exhaust Form
- ☐ Discard all the information provided for the request and start with a fresh Part 1A
- ☐ State Waiver Option

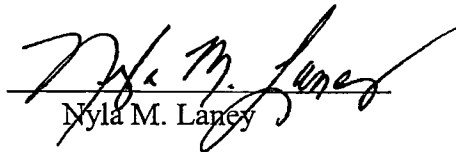
STATE OF SOUTH CAROLINA	)	
	)	CERTIFICATE OF SERVICE
COUNTY OF RICHLAND	)	

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth's Petition for Review of NXX Code Denial in the Mt. Pleasant Rate Center to be served by the method indicated below upon the following this May 14, 2003:

Thomas C. Foley  
NPA Relief Planner – Eastern Region NANPA  
NeuStar – NANPA  
820 Riverbend Blvd.  
Longwood, FL 32779-2327

Ms. Kathy Miller  
Regulatory Policy Attorney  
NeuStar  
1120 Vermont Avenue NW  
Suite 400  
Washington, DC 20005

F. David Butler, Esquire  
General Counsel  
S. C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)

  
Nyla M. Laney

PC Docs # 491002